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JUNE 20, 2019

THE HONORABLE CHERYL L. POLLACK, MAGISTRATE JUDGE
U.S. DISTRICT COURT FOR THE EASTERN DISTRICT OF NEW YORK
2225 Cadman Plaza East
Brooklyn, NY 11201

Via Case Management/Electronic Case Files (CM/ECF) system

RE: Schneider, et al. v. O'Neill, et al. CASE NO.: 1:17cv-05416-KAM-CLP

CASE STATUS UPDATE

Honorable Judge Pollack:

I am counsel for the Defendants in the above-stated case and write to the Court in response to Dr. Schneider's June 19, 2019 letter to the Court.

The letter penned by Dr. Schneider is indicative of the very thing my clients seek protection from. For whatever reason, Dr. Schneider insists on making horrendous claims and accusations, and fantastic allegations, yet has no evidence to substantiate her claims. Yet her defamatory words and actions are severely damaging my client both on a personal and professional level. The pervasiveness and lengths to which Dr. Schneider has gone to damage my client have impacted him on almost every level. Simply walking down the street, Mr. O'Neill has neighbors stopping him and stating their condolences regarding the vicious things they have read on social media stemming from Dr. Schneider. This has to stop, as the irreparable nature of the harm Dr. Schneider is causing continues to grow each and every day.

In Plaintiff's June 19, 2019 letter she states false things including, but not limited to:

1. Mr. O'Neill takes \$500K to treat anxiety;
2. He has "dirty money";
3. He is extremely dangerous;
4. He has a cult;
5. He was sued many times for beating people, not paying taxes, and money trafficking;
6. He is feared by people who supported him;
7. He has engaged in sexual molestations;
8. Etc.

These allegations and others in Plaintiff's letter are unequivocally false and are again indicative of the smear campaign Plaintiff has been engaged in to injure Derek O'Neill. Falsely and maliciously accusing Mr. O'Neill of sexual molestations and poisoning people in an attempt to damage and hurt him is at the very heart of what defamation is. Mr. O'Neill needs protection from such baseless attempts to hurt him, his reputation and cause him irreparable harm. Freedom of speech, which Dr. Schneider demands, does not give her the right to engage in defamation to utterly destroy a man, his philanthropic causes and his family.

Dr. Schneider has now colluded with Calamity News, believed to be some type of tabloid media outlet or possibly just a single individual, to spread Dr. Schneider's propaganda on social media, including Facebook, to cause injury to Mr. O'Neill.

With the nature and severity of the allegations Dr. Schneider feels free to disseminate about Derek O'Neill, without fear of repercussion or thought of who she may be damaging, Mr. O'Neill is seeking the Court's assistance to provide some level of protection. Defendant asks where is even an iota of evidence to corroborate any of the insidious claims being made by Dr. Schneider. This is explicatory of why Mr. O'Neill has anxiety and angst about the lengths and depths Dr. Schneider will go to destroy an innocent man who turned her away and recommended she seek medical help.

In reviewing the blog attached to Dr. Schneider's Letter, nowhere in the blog is Dr. Schneider's name ever stated. It is curious that Dr. Schneider has no problem very specifically and defamatorily attacking Mr. O'Neill, but the moment Mr. O'Neill seeks to protect himself from the onslaught of attacks lodged against him, Dr. Schneider calls foul play. It is further reason why Defendant's seek protection from Plaintiff and her campaign of defamation against Mr. O'Neill.

Again, Defendant seeks relief from the Court to protect Mr. O'Neill from Dr. Schneider's attacks. Defendants' request for the entry of a restraining order preventing the parties from mentioning the other party's name, directly or indirectly, or through third parties in public ("Public Statements"). Public Statements should include, but not be limited to posts or writings to or on the internet, articles, books, letters, speaking engagements, interviews or verbal or written conversations with or to third parties.

I have also attached a copy of the letter Dr. Schneider signed back in February 2017, apologizing for the very thing she continues to do. If the Court needs anything further regarding this or would like additional emails or information evidencing Dr. Schneider's attacks on Derek O'Neill, please don't hesitate to inquire.

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I am also sending a copy of this letter directly to Plaintiffs Via First Class Mail and Registered Mail (Return Receipt Requested).

Thank you.

Sincerely,

BUKH LAW FIRM, PLLC



Chris C. Rogers
Attorneys for Defendants

Encl.

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